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8 Attorneys for Defendants
9 CAPITAL ASSET EXCHANGE & TRADING LLC,
10 CAE ONLINE LLC, RYAN JACOB, and JEFFREY
11 ROBBINS

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SEMICONDUCTOR GLOBAL
15 SOLUTIONS,

16 Plaintiff,

17 v.

18 CAPITAL ASSET EXCHANGE &
19 TRADING LLC; CAE ONLINE LLC;
20 RYAN FRANZKE JACOB, individually;
21 and JEFFREY SCOTT ROBBINS,
22 individually,

23 Defendants.

Case No. 4:25-cv-04075-HSG

**DECLARATION OF WILLIAM J.
FRIMEL IN SUPPORT OF MOTION BY
DEFENDANTS CAPITAL ASSET
EXCHANGE & TRADING LLC, CAE
ONLINE LLC, RYAN JACOB, AND
JEFFREY ROBBINS TO STAY ACTION
PENDING DETERMINATION BY OFFICE
OF FOREIGN ASSETS CONTROL**

Hearing Date: July 31, 2025

Hearing Time: 2:00 p.m.

Courtroom: 2

Judge: Hon. Haywood S. Gilliam, Jr.

DECLARATION OF WILLIAM J. FRIMEL

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2 1. I am lead counsel for Defendants Capital Asset Exchange & Trading LLC, CAE
3 Online LLC, Ryan Jacob and Jeffrey Robbins (collectively, “Defendants”) in the above-
4 referenced action.

5 2. The parties to this action have not yet served discovery.

6 3. The pleadings are not yet settled in this action, as Defendants’ motion to partially
7 dismiss Plaintiff Semiconductor Global Solutions’ First Amended Complaint is set to be heard on
8 July 31, 2025.

9 4. I declare under penalty of perjury under the laws of the United States of America
10 that the foregoing is true and correct.

11
12 Dated: May 28, 2025

/s/ William J. Frimel

13 WILLIAM J. FRIMEL
14 Attorneys for Defendants
15 CAPITAL ASSET EXCHANGE & TRADING LLC,
16 CAE ONLINE LLC, RYAN JACOB, and JEFFREY
17 ROBBINS
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